

July 6, 2001

Mr. J. Jay Grove  
GATX Rail Corporation  
500 West Monroe Street  
Chicago, Illinois 60661-3677

Re: Registered Construction and Operation Status,  
**167-14329-00130**

Dear Mr. Grove:

The application from GATX Rail Corporation, received on May 10, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following Rail Car Cleaning System, to be located at 4400 Maple Avenue, Terre Haute, Indiana 47804, is classified as registered:

1. Railcar Wash Unit consisting of two (2) 1500 gallon tanks and one (1) 200 gpm pump, with a maximum capacity of cleaning 1 railcar every 6 hours (with a maximum residual volume of 5 gallons per car), exhausting to ambient.
2. Vacuum Pump, with a maximum capacity of 270 cfm, exhausting to stack 1.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
2. The source needs to obtain prior approval before making any change that would increase the potential to emit of VOC above 25 tons per year.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) that the source is in operation and in compliance with this

registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

**Compliance Data Section  
Office of Air Management  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015**

and

**Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

George M. Needham  
Director  
Vigo County Air Pollution Control

RKH

cc: Mindy Hahn - IDEM-OAQ, Permit Branch  
Winter Bottum - IDEM-OAQ

<b>Registration Annual Notification</b>
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This form should be used to comply with the notification requirements under  
326 IAC 2-5.1-2(f)(3)

<b>Company Name:</b>	<b>GATX Rail Corporation</b>
<b>Address:</b>	<b>4400 Maple Ave.</b>
<b>City:</b>	<b>Terre Haute</b>
<b>Authorized individual:</b>	<b>J. Jay Grove</b>
<b>Phone #:</b>	<b>(312) 621-8456</b>
<b>Registration #:</b>	<b>167-14329-00130</b>

I hereby certify that GATX Rail Coproration is still in operation and is in compliance with the requirements  
of Registration **167-14329-00130**.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Vigo County Air Pollution Control**

**Technical Support Document (TSD) for a Registered Source**

**Source Background and Description**

**Source Name:** GATX Rail Corporation  
**Source Location:** 4400 Maple Ave., Terre Haute, Indiana 47804  
**County:** Vigo County  
**SIC Code:** 4741  
**Operation Permit No.:** 167-14329-00130  
**Permit Reviewer:** Rob Harmon

Vigo County Air Pollution Control (VCAPC) has reviewed an application from GATX Rail Corporation relating to the construction and operation of a railcar cleaning system.

**Emission Units and Pollution Control Equipment**

The source consists of the following new emission units and pollution control devices:

1. Railcar Wash Unit consisting of two (2) 1500 gallon tanks and one (1) 200 gpm pump, with a maximum capacity of cleaning 1 railcar every 6 hours (with a maximum residual volume of 5 gallons per car), exhausting to ambient.
2. Vacuum Pump, with a maximum capacity of 270 cfm, exhausting to stack 1.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1	Vacuum Pump	5	2 inch	370	ambient

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 10, 2001.

There were several neighbors that called with questions and concerns about this project. However, most of their concerns were related to possible well contamination and other water related issues. At this time no Air Impact related issues have been raised that would affect this approval.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1 of 1).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM-10	negligible
SO <sub>2</sub>	negligible
VOC	22.96
CO	negligible
NO <sub>x</sub>	negligible

HAP's	Potential To Emit (tons/year)
benzene	0.17
napthalene	0.04
ethylbenzene	0.15
n-hexane	1.42
cumene	0.02
toluene	0.81
xylene	0.77
TOTAL	3.38

## County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Vigo County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	negligible
PM10	negligible
SO <sub>2</sub>	negligible
VOC	22.96
CO	negligible
NO <sub>x</sub>	negligible
Single HAP	1.42
Combination HAPs	3.38

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Vigo County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3

(Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 8-1-6 (General Reduction Requirement)**

This new source is not subject to the requirements of 326 IAC 8-1-6 because the potential to emit VOC is less than the 25 ton per year threshold.

#### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (Appendix A, Page 1 of 1).

#### **Conclusion**

The construction and operation of this railcar cleaning system shall be subject to the conditions of the attached Registration 167-14329-00130.

**Appendix A: Emission Calculations**

**Company Name: GATX Rail Corporation**  
**Address City IN Zip: 4400 Maple Ave, Terre Haute, Indiana 47804**  
**CP: 167-14329**  
**Plt ID: 167-00130**  
**Reviewer: Rob Harmon**  
**Date: May 17, 2001**

**Rail Car Cleaning Operation:**

5 gallons (maximum residual per rail car)  
 6 hours (minimum cycle time to clean a rail car)

1460 potential rail cars cleaned per year (8760 hours per year / minimum cycle time)  
 7300 potential gallons of the commodity lost due to this cleaning operation

It is believed that Jet Fuel JP-4 consists of the worst case emissions for both VOC and HAPs.  
 The physical properties of JP-4 are:

6.29 lbs / gallon of JP-4		45917 lbs of VOC potential
100% VOC content of JP-4		22.96 tons of VOC potential
0.72% wt % benzene	----->	0.17 tons per year benzene
0.17% wt % napthalene	----->	0.04 tons per year napthalene
0.67% wt % ethylbenzene	----->	0.15 tons per year ethylbenzene
6.19% wt % n-hexane	----->	1.42 tons per year n-hexane
0.10% wt % cumene	----->	0.02 tons per year cumene
3.53% wt % toluene	----->	0.81 tons per year toluene
3.34% wt % xylenes	----->	0.77 tons per year xylenes
14.72% wt % Total HAPs	----->	3.38 tons per year Total HAPs